

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS

IN RE:

Blanche H Wreath

Debtor(s).

In proceedings under  
Chapter 13

Bk. No.: 16-31882

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TRUSTEE'S MOTION TO COMPEL

COMES NOW, RUSSELL C. SIMON, Chapter 13 Trustee, and in support of his Motion states as follows

1. The instant case was filed on December 16, 2016.
2. Russell C. Simon was appointed as the Trustee on December 16, 2016.
3. On December 27, 2021, the Trustee emailed Debtor(s)' Counsel requesting the Verification of Compliance with Debtor(s)' duties and obligation regarding disclosure of Property of the Estate be provided within 21 days; to date, no Verification has been submitted.
4. The Trustee cannot proceed with the closing of the instant case until the required Verification is submitted.
5. As such, the Trustee seeks an Order compelling the Debtor(s) to submit the requisite Verification of Compliance.

Wherefore, the Trustee prays this Court for an Order compelling Debtor(s) to submit an Verification of Compliance with Debtor(s)' duties and obligation regarding disclosure of Property of the Estate within 30 days and for all other relief this Court deems just and equitable.

/s/ Russell C. Simon

RUSSELL C. SIMON, Trustee

Chapter 13 Trustee

24 Bronze Pointe

Swansea, Illinois 62226

Telephone: (618) 277-0086

Telecopier: (618) 234-0124

Dated: January 18, 2022

LD

I hereby certify that a true and correct copy of the above and foregoing Trustee's Motion to Compel Amended Plan was served on the parties listed below by ordinary U.S. Mail (with the correct postage prepaid and deposited in the U.S. Mail in Belleville, IL) or served electronically through the Court's ECF System at the email address registered with the Court on this day, January 18, 2022.

/s/Lisa

Blanche H Wreath  
213 Picker Ave  
Wood River, IL 62095

KARL J WULFF  
430 REGENCY CENTRE  
COLLINSVILLE, IL 62234